1 JESSE S. KAPLAN CSB#103726 5441 Fair Oaks Bl. Ste. C-1 2 Carmichael, CA 95608 916/488-3030 3 916/489-9297 fax 4 **Attorney for Plaintiff** 5 ALYAA ABDULKAREEM 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 -o0O0o-11 12 ALYAA ABDULKAREEM, No. 2:20-cv-02308-DMC(SS) 13 Plaintiff, 14 MOTION AND ORDER FOR 15 **EXTENSION OF** TIME TO FILE PLAINTIFF'S 16 MOTION FOR SUMMARY v. **JUDGMENT** 17 Kilolo Kijakazi, 18 COMMISSIONER OF SOCIAL SECURITY, 19 Defendant. 20 21 Plaintiff Alyaa Abdulkareem and defendant Commissioner of Social Security, through 22 their undersigned counsel, stipulate that plaintiff may have until September 7, 2021, to file her 23 motion for summary judgment. 24 This is a second request, of two additional business days. Plaintiff's counsel acknowledges 25 26 the recent change in court policy regarding the handling of Social Security appeals. However, 27 besides the work referred to in the recent, prior request for extension of time, counsel unexpectedly 28

1	had to prepare an entire opening brief and excerpts of record for the Ninth Circuit, meaning to	
2	such opening briefs, aside from everything else, including briefs in this Court and an eight-pag	
3	single-spaced letter-brief to the Appeals Council, have been prepared since that earlier request wa	
4 5	made August 12.	
	Dated: September 1, 2021	/s/ Jesse S. Kaplan
6 7	Dated. September 1, 2021	/s/ Jesse S. Kaplan JESSE S. KAPLAN Attorney for Plaintiff
8		·
9		PHILLIP A. TALBERT Acting United States Attorney
10		DEBORAH LEE STACHEL Regional Counsel, Region IX
11		Social Security Administration
12		
13	Dated: September 1, 2021	/s/ per e-mail authorization
14		DANIEL TALBERT
15		Special Assistant U.S. Attorney Attorney for Defendant
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17		
18	<u>o</u>	<u>RDER</u>
19	For good cause shown on the basis of this stimulation, the requested extension of	
20	For good cause shown on the basis of this stipulation, the requested extension of plaintiff's time to file a motion for summary judgment brief is extended to September 7, 2021.	
21		
22	SO ORDERED.	
23	Dated: September 2, 2021	St. Co.
24		DENNIS M. COTA
25		UNITED STATES MAGISTRATE JUDGE
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